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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS DORSEY,

Plaintiff,

v.

MARK T. ESPER, in his capacity as the
United States Secretary of the Army,

Defendant.

Case No. 2:18-cv-00209-APG-NJK

**UNOPPOSED MOTION TO STAY
PROCEEDINGS PENDING
COMPROMISE SETTLEMENT**

Federal Defendant Mark T. Esper, in his official capacity as the United States Secretary of the Army, respectfully requests this Court enter a stay of all proceedings and deadlines, including all motion and discovery deadlines, until October 12, 2018, in order to allow the parties to finalize the terms of a settlement agreement and to execute and enter a Stipulation to Dismiss with Prejudice. Plaintiff does not oppose this request.

In support of this motion, Federal Defendant submits as follows:

1. Over the past several weeks the parties have been engaged in settlement negotiations and have recently agreed in principal to a compromise settlement which will resolve all outstanding claims between the parties. Documents supporting this settlement are being prepared and the parties expect that the matter will be concluded within the next month.

2. Courts have broad discretion to stay proceedings for a limited time. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254-55 (1936); *see also Clinton v. Jones*, 520 U.S. 681, 706 (1997) (courts have broad discretion in the management of cases, including the setting of cases for trial).

3. The instant motion is filed in good faith and not for the purposes of delay.

4. If the matter is not concluded by October 12, 2018, the parties will file a status report advising of reasons that it is not concluded.


For the above reasons, Federal Defendant respectfully requests this Court stay the proceedings and deadlines in this matter until October 12, 2018.

Respectfully submitted this 11th day of September 2018.

DAYLE ELIESON
United States Attorney

/s/ Krystal J. Rosse
 KRYSTAL J. ROSSE
 Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
Dated: September 11, 2018.

PROOF OF SERVICE

I, Krystal J. Rosse, certify that the **UNOPPOSED MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT** was served this date on all parties via the Court's Electronic Case Filing system.

Dated this 11th day of September 2018.

/s/ Krystal J. Rosse
 KRYSTAL J. ROSSE
 Assistant United States Attorney